

**ADDENDUM TO THE REPORT
OF THE**

**COMMITTEE ON ADMINISTRATIVE
PROCESSES**

**ILLINOIS GEOLOGICAL
SURVEY LIBRARY
OCT 22 1984**

**Illinois Hazardous Waste Task Force
FINAL CONFERENCE
March, 1984
Springfield**

ADMINISTRATIVE PROCESSES

Six individuals addressed the Administrative Processes Committee Report. They were:

Cliff Lake-Illinois Manufacturer's Association

Joe Linskey-Committee for the Advancement of Responsible Environmental solutions (CARES)

Williams Frerichs-Department of Energy and Natural Resources

Gretchen Monti-League of Women Voters

Jacob Dumelle-Chairman, Pollution Control Board, and

June Edvensen (written testimony only)

For the most part, the comments submitted by these individuals were favorable and supportive of the Committee's recommendations. Notable exceptions are as follows:

1. A number of points addressed Recommendation #10 (p. IV-16), dealing with requiring mediation prior to concurrent legal action against a permitted hazardous waste facility (i.e., alternative technology facilities). The recommendation was cited as being too site-specific and difficult, if not impossible, to implement, particularly in regard to the "neutral participant" recommended for mediation. It was also pointed out that simple communication between the parties involved could help remedy the problems addressed by the recommendation. In light of these comments, and the fact that Recommendation #10 was suggested to the Committee by the Alternative Technologies Committee, it was felt that Recommendation #10 should be eliminated and replaced with a recommendation encouraging more effective and open communication between agencies and affected parties.
2. Recommendation #3 (p. IV-10), dealing with the abolition of the special waste category, was discussed by several of those commenting on the report. The basic focus of this discussion was that the special waste category should not be abolished wholesale, but rather that a compromise should be reached whereby wastes could be classified or graded by degree of hazard. These comments also related to Recommendation #4, dealing with the definition of waste. The Committee felt that some form of compromise between complete abolition and simple retention of the category could be reached, and that the recommendation should be reworded to reflect that position. The Enforcement Committee's recommendation was cited as a possible model.

SYNOPSIS

The Committee's recommendation #10 dealing with requiring some type of formal mediation prior to the commencement of concurrent legal action against a permitted facility will be eliminated and replaced with a recommendation encouraging more effective and open communication between all parties involved.

The Committee's recommendation #3 to eliminate the speical waste category will be modified to reflect a desire to establish a "degree of hazard" classification system as a replacement for the special waste category.

The Committee's recommendation #6 relating to small-quantity generators will be modified to reflect a belief that a state small-quantity generator exemption more in line with the current federal exemption could still meet concerns relating to storage, transportation and others, and could reduce the administrative burdens currently faced by small-quantity generators.



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